

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
CIVIL ACTION NO. 3:19-CV-00012

JANE DOE,

By and through her Guardian *ad litem*,
PAIGE L. PAHLKE;

And

KAREN VAUGHN, Individually,

Plaintiffs,

vs.

JAMES PAUL BLAIR, in his individual
capacity,

Defendant.

MOTION TO SEAL

NOW COMES the Plaintiff, Jane Doe, by and through counsel, and moves the Court pursuant to LCvR 6.1(c) and Fed. R. Civ. P. 5.2(d), for an Order sealing only the Declaration of Plaintiff Jane Doe in Support of Motion for Default Judgment. Permanent sealing of the declaration is sought by Plaintiff Jane Doe because the Declaration details the childhood sexual abuse that Jane Doe suffered at the hands of Defendant Blair. Permanent sealing of the Declaration is warranted because the Complaint filed in this matter serves to reasonably apprise the public of the facts as averred by the Plaintiff Jane Doe in this matter, without subjecting her to the humiliation and embarrassment that may accompany the detailed Declaration.

Consultation with Defendant Blair is not required. LCvR 6.1(b).

This motion is further based upon the court file and records in this action, the accompanying Memorandum of Law, and upon such further evidence as the Court may allow.

This the 12th day of May, 2020.

/s/ Paul A. Tharp

Paul A. Tharp

N.C. Bar No.: 34244

ARNOLD & SMITH, PLLC

The Historic John Price Carr House

200 North McDowell Street

Charlotte, North Carolina 28204

Telephone: 704.370.2828

Facsimile: 704.370.2202

Email: Paul.Tharp@arnoldsmithlaw.com

Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on May 12, 2020, I electronically filed on behalf of Plaintiffs, the foregoing **Motion to Seal** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following registered CM/ECF users or by depositing said document(s) in an envelope addressed as indicated with proper postage attached thereto and depositing same in the United States Mail:

Scott D. MacLatchie
Hall Booth Smith, P.C.
13024 Ballantyne Corporate Place, Suite 625
Charlotte, NC 28277
Attorney for Defendants Bates and City of Lowell

James Paul Blair
Offender Number: 1538496
Pamlico Correctional Institution
601 3rd Street
Bayboro, NC 28515

/s/Paul A. Tharp
N.C. State Bar No.: 34244
Attorney for Plaintiffs
ARNOLD & SMITH, PLLC
The Historic John Price Carr House
200 North McDowell Street
Charlotte, NC 28204
Telephone: (704) 370-2828
Facsimile: (704) 270-2202
E-mail: Paul.Tharp@arnoldsmithlaw.com

CERTIFICATE OF SERVICE

THE UNDERSIGNED HEREBY CERTIFIES that the **MOTION TO SEAL** to which this certificate is attached was served upon the following counsel of record via the use of the CM/ECF system, which will send a notification of such filing and a copy thereof:

Scott D. MacLatchie
Womble Bond Dickinson (US) LLP
301 S. College Street, Ste. 3500
Charlotte, North Carolina 28202
Scott.maclatchie@wbd-us.com

This the 14th day of December, 2018.

/s/ Paul A. Tharp _____
Paul A. Tharp